

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington.

April 30 2025
By [Signature] Ravi Subramanian, Clerk
Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff

v.

CHERIAN ABRAHAM,
Defendant.

NO.

CR 25 - 055 KKE

INDICTMENT

The Grand Jury charges that:

COUNT 1

(Abusive Sexual Contact)

On or about March 18, 2025, within the special aircraft jurisdiction of the United States, that is, while aboard an aircraft in flight traveling nonstop from Chicago to SeaTac, King County, Washington, within the Western District of Washington, and elsewhere, CHERIAN ABRAHAM did knowingly and intentionally engage in sexual contact with Victim 1, that is, touch Victim 1's breast, without Victim 1's permission and with the intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person.

1 All in violation of Title 18, United States Code, Section 2244(b) and Title 49
2 United States Code, Section 46506(1).

3 **FORFEITURE ALLEGATION**

4 The allegations contained in Count 1 of this Indictment are hereby realleged and
5 incorporated by reference for the purpose of alleging forfeiture. Upon conviction of the
6 offense alleged in Count 1, CHERIAN ABRAHAM shall forfeit to the United States
7 pursuant to Title 18, United States Code, Section 2253(a)(2) and (3), all property used to
8 commit or to facilitate commission of the offense and any proceeds of the offense.

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1 **Substitute Assets.** If any of the above-described forfeitable property, as a result of
2 any act or omission of the defendant,

- 3 a. cannot be located upon the exercise of due diligence;
4 b. has been transferred or sold to, or deposited with, a third party;
5 c. has been placed beyond the jurisdiction of the Court;
6 d. has been substantially diminished in value; or,
7 e. has been commingled with other property which cannot be divided
8 without difficulty,

9 it is the intent of the United States to seek the forfeiture of any other property of the
10 defendant, up to the value of the above-described forfeitable property, pursuant to
11 Title 21, United States Code, Section 853(p).

12
13 A TRUE BILL: *yes*

14 DATED: *3 APR 25*

15
16 *Signature of Foreperson redacted pursuant*
17 *to the policy of the Judicial Conference of*
18 *the United States.*

19 _____
20 FOREPERSON

21 
22 TEAL LUTHY MILLER
23 Acting United States Attorney

24 
25 AMY JAQUETTE
26 Assistant United States Attorney

27 
 AJAY RAVINDRAN
 Special Assistant United States Attorney